

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware
corporation; AMAZON.COM SERVICES
LLC, a Delaware limited liability company; and
CARTIER INTERNATIONAL A.G., a Swiss
corporation,

Plaintiffs,

v.

LI XINJUAN, an individual d/b/a Phmn9y3v,
and Selling Accounts Phmn9y3v Jewelry and
Miao-He; SHENZHEN XINJIANHE
TECHNOLOGY CO., LTD, a Singapore
limited company d/b/a Phmn9y3v; ZHU JIAN,
an individual d/b/a Selling Accounts Phmn9y3v
Jewelry, Amazing Jewelry You Want, Vfdnytu,
and Yinji; and ZHOU FUHAN, an individual
d/b/a Selling Accounts Byqone US and Byqone
Network,

Defendants.

No. 2:22-cv-00840-MJP

**PLAINTIFFS' *EX PARTE* MOTION
TO FILE OVER-LENGTH MOTION
FOR DEFAULT JUDGMENT AND
PERMANENT INJUNCTION
AGAINST DEFENDANTS**

WITHOUT ORAL ARGUMENT

NOTE ON MOTION CALENDAR:
SEPTEMBER 11, 2024

Pursuant to Local Civil Rule 7(f), Plaintiffs Amazon.com, Inc., Amazon.com Services
LLC ("Amazon"), and Cartier International A.G. ("Cartier" and together with Amazon,
"Plaintiffs") request that the Court permit them to file an over-length *ex parte* motion in support
of their request for an order from this Court granting default judgment and permanent injunction
against Defendants Li Xinjuan, Shenzhen Xinjianhe Technology Co., Ltd, Zhu Jian, and Zhou
Fuhan. Local Civil Rule 7(e)(1) provides that motions brought pursuant to Local Civil Rule

PLAINTIFFS' *EX PARTE* MOTION TO
FILE OVER-LENGTH MOTION - 1
(2:22-cv-00840-MJP)

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7(d)(1), including motions for default judgment where the opposing party has not appeared, are limited to 2,100 words. By this request, Plaintiffs seek to file a motion containing approximately 6,600 additional words, for a total limit of 8,700 words.

Plaintiffs contend that the additional words are necessary to provide sufficient explanation of the facts surrounding Defendants' sale of counterfeit Cartier products in the Amazon.com store; Defendants' failure to appear or respond to discovery and subsequent defaults; Defendants' established liability under each of the claims made by Plaintiffs; and Plaintiffs' request for awards of statutory damages against Defendants. Plaintiffs' motion provides support for theories of both direct and contributory liability.

Thus, the 2,100 word limit is insufficient for Plaintiffs to provide this Court with the facts and authorities supporting the motion and to demonstrate Plaintiffs' need for an order allowing for default judgment and permanent injunction against Defendants. For these reasons, Plaintiffs seek permission to file an over-length motion to provide this Court with the full detail necessary to support the order they seek.

DATED this 11th day of September, 2024.

I certify that this memorandum contains 253 words, in compliance with the Local Civil Rules.

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